

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 1-6 and 8-16 are pending in this application. Claim 7 is canceled by the present response without prejudice and claims 15 and 16 are added by the present response. Claims 1, 7, 8, and 14 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. patent 6,546,052 to Maeda et al. (herein “Maeda”). Claims 2, 3, 9, and 10 were rejected under 35 U.S.C. § 103(a) as unpatentable over Maeda. Claims 4 and 11 were rejected under 35 U.S.C. § 103(a) as unpatentable over Maeda as applied to claims 1-3, 8-10, and 14, and further in view of U.S. patent 6,611,628 to Sekiguchi et al. (herein “Sekiguchi”). Claims 5, 6, 12, and 13 were rejected under 35 U.S.C. § 103(a) as unpatentable over Maeda and Sekiguchi as applied to claims 1-4, 8-11, and 14, and further in view of U.S. patent 6,400,890 to Nagasaki et al. (herein “Nagasaki”).

Addressing the above-noted rejections, those rejections are traversed by the present response.

Initially, applicants note independent claim 1 is amended by the present response to now more clearly recite that the first feature amount computing device computes “at least some of a number of motion vectors, distribution, norm size, residual error after motion compensation, and variance of luminance and chrominance” for each of time-continuous frames of a video image. Independent claim 1 now also recites the scene dividing device is configured to divide the video image into a plurality of scenes continuous in time in accordance with “at least some of a number of motion vectors, distribution, norm size, residual error after motion compensation, and variance of luminance and chrominance”. Such a feature was recited in previously pending dependent claim 7, and accordingly claim 7 is canceled by the present response. Independent claims 8 and 14 are also amended by the present response to include similar features.

Applicants respectfully submit such features clearly distinguish over the teachings in Maeda.

More particularly, Maeda discloses in Figures 1-5 an imaging processing apparatus in which an image of a person is extracted as a rectangular texture, and the blue-back portion is extracted to generate mask information. Image data of the texture and mask information is input to the object and coding unit 105. That is, in Maeda an object and a background are separately captured, encoded, and then combined. In Maeda the object and background of a single frame are separately extracted and encoded.

Maeda does not disclose or suggest the above-noted clarified features of computing at least some of a number of motion vectors, distribution, norm size, residual error after motion compensation, and variance of luminance and chrominance for each of time-continuous frames.

As noted above, such a feature was similarly recited in dependent claim 7. With respect to that feature the outstanding Office Action cited Maeda at Figure 5 and columns 8-9. However, applicants respectfully submit such teachings in Maeda do not disclose the above-noted features.

Figure 5 of Maeda is an overall block diagram of an object and coding unit 105. Columns 8-9 of Maeda disclose the operation of the coding unit 105.

However, no portion in Figure 5 or columns 8-9 of Maeda discloses the above-noted feature of computing at least some of a number of motion vectors, distribution, norm size, residual error after motion compensation, and variance of luminance and chrominance for each of time-continuous frames.

One basis for maintaining the rejection based on Maeda stated in the Office Action is as follows:

...Maeda clearly teachings the extraction of the images of the person from object extractor 103 through time continuous frames due to the fact that moving input images are being input to the object extractor 103 and the object images from the object extractor 103 are compressed by MPEG-4 (see column 7, line 9 to column 8, line 11). In other words, each of the images of the person as extracted by object extractor 103 of Maeda represents a scene of the video, and since successive images of the person in the moving video image (time-continuous frames) are extracted, the moving video image is thus divided into a plurality of scenes continuous in time in accordance with the statistic of feature amount (image of the person), as claimed. For the reasons above, it is submitted that the claimed invention is rendered anticipated by Maeda.<sup>1</sup>

The above-noted basis for the outstanding rejection recognizes that Maeda extracts an image of a person. However, Maeda clearly does not disclose computing at least some of a number of motion vectors, distribution, norm size, residual error after motion compensation, and variance of luminance and chrominance, and further dividing a video image into a plurality of scenes continuous in time in accordance with at least some of a number of motion vectors, distribution, norm size, residual error after motion compensation, and variance of luminance and chrominance. As recognized above, Maeda merely extracts images of a person from different frames.

In such ways, each of amended independent claims 1 and 8, and the claims dependent therefrom, are believed to clearly distinguish over the applied art to Maeda.

Moreover, no teachings in any of the further cited references to Sekiguchi or Nagasaki are believed to overcome the above-noted deficiencies of Maeda.

The present response also sets forth new independent claim 15 and claim 16 dependent therefrom for examination. New independent claim 15 is similar to previously pending independent claim 1 but additionally recites computing “a number of motion vectors for each of time-continuous frames...” and “dividing the video image into a plurality of

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<sup>1</sup> Office Action of April 20, 2005, bottom of page 6.

scenes continuous in time in accordance with the number of motion vectors...". Such features are also believed to clearly distinguish over Maeda.

As discussed above, the outstanding rejection recognizes that Maeda merely extracts images of a person from different frames. Maeda does not teach or suggest computing a number of motion vectors for each of time-continuous and further dividing a video image into a plurality of scenes continuous in time in accordance with the number of motion vectors. Dependent claim 16 even further recites the different distributions of the vectors. Such features recited in new claims 15 and 16 are believed to also clearly distinguish over the applied art.

In view of these foregoing comments, applicants respectfully submit the claims as currently written distinguish over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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